



**UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
WATER AND
WATERSHEDS

December 28, 2012

Tricia Miller, Water Quality Permit Coordinator
Department of Ecology
3190 160th Ave SE
Bellevue, WA 98008-5452

Re: U.S. Environmental Protection Agency Comments
Draft National Pollutant Discharge Elimination System Permit and Fact Sheet
Seattle Iron & Metals Corp, Permit Number WA0031968

Dear Ms. Miller:

The EPA has selected to review the above-referenced permit consistent with the Performance Partnership Agreement (PPA) and the EPA's obligation to oversee implementation of the National Pollutant Discharge Elimination System (NPDES) program by delegated states. The EPA reviewed the draft permit for consistency with federal laws and regulations and with Ecology's regulations and permit writing guidance.

Seattle Iron & Metals Corporation (SIM) is a scrap metal processor. The facility discharges stormwater to the Seattle storm drain system, which then discharges into the Duwamish Waterway at South Garden Street. SIM's industrial areas produce process wastewater that includes stormwater, and dust suppression/control water, and injection water unconsumed during the shredding process. The final treatment consists of chemical flocculation, dissolved air floatation, and sand filtration.

The EPA has the following comments on the draft permit during the public comment period ending December 30, 2012. The review focused on the water quality based effluent limits and the meeting anti-backsliding provisions of the Clean Water Act.

The draft permit incorporates new, less stringent, limits for various pollutants and authorizes a new mixing zone. The permit and fact sheet must demonstrate that the proposed effluent limitations meet antidegradation and anti-backsliding provisions of the Clean Water Act, sections 402(o) and 303(d)(4). Refer to the EPA's NPDES Permit Writers' Manual (http://www.epa.gov/npdes/pubs/pwm_2010.pdf) for guidance in addressing these requirements.

Please contact me at (206) 553-1755 or by email at lidgard.michael@epa.gov if you have any questions about this letter or related matters, or you may contact Karen Burgess of my staff at (206) 553-1644 or by email burgess.karen@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Karen Burgess for". The signature is fluid and cursive.

Michael J. Lidgard, Manager
NPDES Permits Unit

cc: Tricia Miller, Ecology, via email tmil461@ecy.wa.gov
Ed Abbasi, Ecology, via email eabb461@ecy.wa.gov